

**UNITED STATES DISTRICT COURT**



Lama Maksosa

Plaintiff Vs.

Case ID 1:21-cv-00025

Amazon.com and Amazon Web  
Services

Defendant

**Failure to file Notice of Hearing or a Memorandum**

Responding to the court letter dated March 24, 2021. Please note that plaintiff Lama Maksosa didn't complete the summon service upon request from the defendants Amazon.com attorney on Feb 17, please find attached email correspondence, hence, plaintiff shared soft copy of the complaint back in Feb 7 2021 while working on the summons to be served.

Respectfully,  
Lama Maksosa  
44044 Ferncliff Terrace  
Ashburn, VA 20147  
Lama.i.makossa@gmail.com  
Ph: 571-223-9759



Lama Maksosa <lama.i.maksosa@gmail.com>

## RE: Settlement agreement decision

1 message

**Paterson, Adrienne (Perkins Coie)** <APaterson@perkinscoie.com>  
To: Lama Maksosa <lama.i.maksosa@gmail.com>  
Cc: "Moriarty, Andrew (Perkins Coie)" <AMoriarty@perkinscoie.com>

Wed, Mar 24, 2021 at 3:04 PM

Lama,

Attached please find a copy of the notice of appearance I filed. You will also be receiving a copy via U.S. mail. Additionally, for your review, please find the joint proposed motion to stay and a consent order. If you are ok with the contents please sign in ink where the signature line for your name is (preferably blue) and fax or email back to me so I can get it on file.

Best,

Adrienne

**Adrienne Paterson** | **Perkins Coie LLP**

ASSOCIATE

700 Thirteenth Street, N.W. Suite 600

Washington, DC 20005-3960

D +1 202 864 6075

F +1 202 524 9532

E [APaterson@perkinscoie.com](mailto:APaterson@perkinscoie.com)

**From:** Lama Maksosa <lama.i.maksosa@gmail.com>  
**Sent:** Tuesday, March 9, 2021 12:30 PM  
**To:** Paterson, Adrienne (WDC) <APaterson@perkinscoie.com>  
**Cc:** Moriarty, Andrew (SEA) <AMoriarty@perkinscoie.com>  
**Subject:** Re: Settlement agreement decision

Yes Adrienne , option 3 is fine!

Thanks,

Lama

Sent from my iPhone

On Mar 4, 2021, at 4:47 PM, Paterson, Adrienne (Perkins Coie) <[APaterson@perkinscoie.com](mailto:APaterson@perkinscoie.com)> wrote:

Lama,

No trouble at all. Thank you for getting back to me. The issue is that the court case cannot proceed at the same time as the EEOC investigation. The EEOC process has to be completed first. So the options are:

1. You file a voluntary dismissal of the court case and the EEOC continues its investigation
  - if you choose this you will have to refile the court case after the EEOC is done and pay another filing fee.
2. Amazon files a motion to dismiss the court case and the EEOC continues its investigation
  - if the court grants our dismissal, which we believe they will based on the law, you will have to refile the court case after the EEOC is done and pay another filing fee.
3. We (Amazon and you) submit a joint motion to stay the court case and the EEOC continues its investigation
  - if the court grants the motion, it will pause the court case until the EEOC is done and no additional filing fee will be needed.
4. You contact the EEOC and ask them to issue a new right to sue letter
  - this way we can focus on the court case and the EEOC can stop investigating.

In my below email I suggested option 3 (a joint motion to stay the court case). I suggested this because you said you wanted the EEOC to complete their investigation and option 3 means you do not have to pay another filing fee. Would you like to move forward with option 3? If not please let us know where you stand as soon as you can.

Best,

Adrienne

**Adrienne Paterson | Perkins Coie LLP**

ASSOCIATE

700 Thirteenth Street, N.W. Suite 600

Washington, DC 20005-3960

D: +1 202.654.6275

E: [APaterson@perkinscoie.com](mailto:APaterson@perkinscoie.com)

**From:** Lama Maksosa <[lama.i.maksosa@gmail.com](mailto:lama.i.maksosa@gmail.com)>  
**Sent:** Wednesday, March 3, 2021 7:17 PM  
**To:** Paterson, Adrienne (WDC) <[APaterson@perkinscoie.com](mailto:APaterson@perkinscoie.com)>  
**Cc:** Moriarty, Andrew (SEA) <[AMoriarty@perkinscoie.com](mailto:AMoriarty@perkinscoie.com)>  
**Subject:** Re: Settlement agreement decision

Hi Adrienne,

Sorry for the late reply, just saw your message, how that will be different than what I requested before to keep the case pending EEOC investigation?

Best,

Lama

Sent from my iPhone

On Mar 2, 2021, at 1:59 PM, Paterson, Adrienne (Perkins Coie)  
<[APaterson@perkinscoie.com](mailto:APaterson@perkinscoie.com)> wrote:

Lama,

I wanted to follow up with you about the court case. As I mentioned on our call and in my email we are planning to file a motion to dismiss your case. The law requires that the EEOC investigation be complete before a court case can proceed. Since the EEOC revoked its right to sue letter and is still investigating we believe your case cannot proceed in court at this time. If we file the motion to dismiss and it is granted you will have to refile you case after the EEOC case is completed. This would require you to pay another filing fee and re-serve the complaint. You could also dismiss your case voluntarily but this would, again, require an another filing fee.

To avoid having you go through the additional expense we wanted to propose filing a joint motion to stay the court proceedings. Essentially it would be a request to the court from you and Amazon (that you and I would sign) asking the court to hold off on moving the case forward until the EEOC is done investigating. We can then ask the court to reopen the case afterward. If the court grants this request it would avoid you having to refile, the fee, and serving Amazon again.

Please let u know your thoughts as soon as you can but at least in the next week or so.

Best,

Adrienne

Adrienne Paterson | Perkins Coie LLP

ASSOCIATE

700 Thirteenth Street, N.W. Suite 600

Washington, DC 20005-3960

D. +1.202.654.6275

F. +1.202.624.9533

E. [APaterson@perkinscoie.com](mailto:APaterson@perkinscoie.com)

—Original Message—

From: Lama Maksosa <[lama.i.maksosa@gmail.com](mailto:lama.i.maksosa@gmail.com)>

Sent: Thursday, February 25, 2021 8:05 AM

To: Paterson, Adrienne (WDC) <[APaterson@perkinscoie.com](mailto:APaterson@perkinscoie.com)>

Cc: Moriarty, Andrew (SEA) <[AMoriarty@perkinscoie.com](mailto:AMoriarty@perkinscoie.com)>

Subject: Re: Settlement agreement decision



Received, thank you Adrienne!

Kind regards,

Lama

Sent from my iPhone

> On Feb 24, 2021, at 10:21 AM, Paterson, Adrienne (Perkins Coie)  
<APaterson@perkinscoie.com> wrote:

>

> Lama,

>

> Attached please find an executed waiver of service of summons.

>

> Best,

>

> Adrienne

>

> Adrienne Paterson | Perkins Coie LLP

> ASSOCIATE

> 700 Thirteenth Street, N.W. Suite 600

> Washington, DC 20005-3960

> D. +1.202.654.6275

> F. +1.202.624.9533

> E. APaterson@perkinscoie.com

>

> -----Original Message-----

> From: Lama Maksosa <lama.i.maksosa@gmail.com>

> Sent: Thursday, February 18, 2021 4:32 PM

> To: Paterson, Adrienne (WDC) <APaterson@perkinscoie.com>

> Cc: Moriarty, Andrew (SEA) <AMoriarty@perkinscoie.com>

> Subject: Re: Settlement agreement decision

>

> Hello Adrienne,

>

> So sorry about that, I actually mailed you the attached not knowing the bottom part needs to be blank.

>

> Please find attached the waiver with the bottom left blank, happy to fix if it is still inaccurate.

>

> As for the lawsuit, can I ask to keep this lawsuit pending till the EEOC finish their investigation as I would like to request it to stay till we do the mediation or discuss settlement options as I know you are reviewing the documents?

>

> Kind regards,

> Lama Maksosa

>

>> On Thu, Feb 18, 2021 at 1:00 PM Paterson, Adrienne (Perkins Coie) <APaterson@perkinscoie.com> wrote:

>>

>> Lama,

>>

>> Just wanted to follow up. You should leave the all the lines below "If I fail to do so, a default judgment will be entered against me or the entity I represent" blank so that we sign and return it to you. It will be your proof to the court that we accepted. You also want to make sure to put the defendant(s) name. Can you resend?

>>

>> -Adrienne

>>

>> Adrienne Paterson | Perkins Coie LLP

>> ASSOCIATE

>> 700 Thirteenth Street, N.W. Suite 600 Washington, DC 20005-3960 D.

>> +1.202.654.6275 F. +1.202.624.9533 E. APaterson@perkinscoie.com

>>

>> -----Original Message-----

>> From: Lama Maksosa <lama.i.maksosa@gmail.com>

>> Sent: Wednesday, February 17, 2021 11:05 AM

>> To: Paterson, Adrienne (WDC) <APaterson@perkinscoie.com>

>> Cc: Moriarty, Andrew (SEA) <AMoriarty@perkinscoie.com>

>> Subject: Re: Settlement agreement decision

>>

>> Good morning Andrew and Adrienne,

>>

>> Please find attached the waiver of service form filled out and signed.

>>

>> Kind regards,

>> Lama Maksosa

>>

>>> On Wed, Feb 17, 2021 at 9:53 AM Lama Maksosa <lama.i.maksosa@gmail.com> wrote:

>>>

>>> Thanks Adrienne!

>>>

>>> I will fill out the waiver of service form and send it to you.

>>>

>>> As for the right to sue letter, the EEOC told me they will be issuing a new one after they conclude their investigation.

>>>

>>> Kind regards,

>>> Lama Maksosa

>>>

>>> Sent from my iPhone

>>>

>>>> On Feb 16, 2021, at 5:05 PM, Paterson, Adrienne (Perkins Coie) <APaterson@perkinscoie.com> wrote:



>>>

>>>

>>>

>>> Lama ,

>>>

>>>

>>>

>>> It was nice speaking with you as well. Attached please find a Waiver of Service of Summons for your convenience.

>>>

>>>

>>>

>>> Additionally, I wanted to memorialize some of the things mentioned on the call:

>>>

>>> After you fill the waiver out and send it to us we will use it to agree to waive service.

>>> However, we will likely file a Motion to Dismiss based on failure to exhaust your administrative remedies (i.e., based on the fact that the EEOC charge is still open). If the Motion to Dismiss is granted it would get rid of your court case until the EEOC is finished. You can solve that problem if the EEOC terminates its investigation and issues a new Right to Sue letter. So you might want to consider requesting they issue a new letter to avoid dismissal of your court case.

>>>

>>>

>>>

>>> Best,

>>>

>>>

>>>

>>> Adrienne

>>>

>>>

>>>

>>>

>>>

>>>

>>>

>>> Adrienne Paterson | Perkins Coie LLP

>>>

>>> ASSOCIATE

>>>

>>> 700 Thirteenth Street, N.W. Suite 600

>>>

>>> Washington, DC 20005-3960

>>>

>>> D. +1.202.654.6275

>>>

>>> F. +1.202.624.9533

>>>

>>> E. [APaterson@perkinscoie.com](mailto:APaterson@perkinscoie.com)

>>>

>>>

>>>

>>> -----Original Message-----

>>> From: Lama Maksosa <[lama.i.maksosa@gmail.com](mailto:lama.i.maksosa@gmail.com)>

>>> Sent: Tuesday, February 16, 2021 1:30 PM

>>> To: Moriarty, Andrew (SEA) <[AMoriarty@perkinscoie.com](mailto:AMoriarty@perkinscoie.com)>

>>> Cc: Paterson, Adrienne (WDC) <[APaterson@perkinscoie.com](mailto:APaterson@perkinscoie.com)>

>>> Subject: Re: Settlement agreement decision

>>>

>>>

>>>

>>> Andrew and Adrienne,

>>>

>>>

>>>

>>> It was a pleasure speaking with you both today.

>>>

>>>

>>>

>>> As mentioned on our call - please don't hesitate to reach out to me for any clarifications that might need to be addressed. Feel free to reply here, or reach me direct at my personal cell below.

>>>

>>>

>>>

>>> Kind regards,

>>>

>>> Lama Maksosa

>>>

>>> 571-223-9759

>>>

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>>>

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>>>

>>>

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>>>

>>>> On Thu, Feb 11, 2021 at 5:23 PM Lama Maksosa <lama.i.maksosa@gmail.com> wrote:

>>>

>>>>

>>>

>>>> Hello Mr. Moriarty:

>>>

>>>>

>>>

>>>> I have received the meeting invite and accepted it.

>>>

>>>>

>>>

>>>> Have a nice weekend too!

>>>

>>>>

>>>

>>>> Regards,

>>>

>>>> Lama Maksosa

>>>

>>>>

>>>

>>>> On Thu, Feb 11, 2021 at 12:14 PM Moriarty, Andrew (Perkins Coie)

>>>

>>>> <AMoriarty@perkinscoie.com> wrote:

>>>

>>>>>

>>>

>>>>> Thanks. I have sent an invitation for noon Tuesday. Have a nice weekend.

>>>

>>>>>

>>>

>>>>> Andrew Moriarty | Perkins Coie LLP

>>>

>>>>> PARTNER

>>>

>>>>> 1201 Third Avenue Suite 4900

>>>

>>>> Seattle, WA 98101-3099

>>>

>>>> +1.206.714.1620

>>>

>>>> AMoriarty@perkinscoie.com

>>>

>>>>

>>>

>>>> Visit our Covid-19 resource page:

>>>> [www.perkinscoie.com/coronavirus](http://www.perkinscoie.com/coronavirus)

>>>

>>>>

>>>

>>>> -----Original Message-----

>>>

>>>> From: Lama Maksosa <lama.i.maksosa@gmail.com>

>>>

>>>> Sent: Wednesday, February 10, 2021 8:40 PM

>>>

>>>> To: Moriarty, Andrew (SEA) <AMoriarty@perkinscoie.com>

>>>

>>>> Cc: Paterson, Adrienne (WDC) <APaterson@perkinscoie.com>

>>>

>>>> Subject: Re: Settlement agreement decision

>>>

>>>>

>>>

>>>> Hello Mr. Moriarty, hope your day is well...

>>>

>>>>



>>>

>>>>> Yes, sure, would either 12:00 PM or 2:00 PM EST on Tuesday work for you?

>>>

>>>>>

>>>

>>>>> Kind regards,

>>>

>>>>> Lama Maksosa

>>>

>>>>>

>>>

>>>>> Sent from my iPhone

>>>

>>>>>

>>>

>>>>>>> On Feb 10, 2021, at 11:08 PM, Moriarty, Andrew (Perkins Coie)  
<AMoriarty@perkinscoie.com> wrote:

>>>

>>>>>>>

>>>

>>>>>>> Hello, Ms. Maksosa. Thank you for the copy of the complaint. I will consult with Amazon regarding accepting service of the complaint.

>>>

>>>>>>>

>>>

>>>>>>> Is there a time on Tuesday when we might connect by phone to introduce ourselves?

>>>

>>>>>>>

>>>

>>>>>>> Andrew Moriarty | Perkins Coie LLP PARTNER

>>>

>>>>> 1201 Third Avenue Suite 4900

>>>

>>>>> Seattle, WA 98101-3099

>>>

>>>>> +1.206.714.1620

>>>

>>>>> AMoriarty@perkinscoie.com

>>>

>>>>>

>>>

>>>>> Visit our Covid-19 resource page:

>>>>> [www.perkinscoie.com/coronavirus](http://www.perkinscoie.com/coronavirus)

>>>

>>>>>

>>>

>>>>> -----Original Message-----

>>>

>>>>> From: Lama Maksosa <lama.i.maksosa@gmail.com>

>>>

>>>>> Sent: Monday, February 8, 2021 3:07 PM

>>>

>>>>> To: Jeffrey Druckman <jeff@jjdlaw.com>

>>>

>>>>> Cc: Moriarty, Andrew (SEA) <AMoriarty@perkinscoie.com>

>>>

>>>>> Subject: Re: Settlement agreement decision

>>>

>>>>>

>>>

>>>>> Ok, thank you for the note Mr. Druckman, will do!

>>>

>>>>>>

>>>

>>>>>> Greetings Mr. Moriarty:

>>>

>>>>>>

>>>

>>>>>> Please find attached the complaint I filed with the US District court in Virginia under case 1:21-cv-00025.

>>>

>>>>>>

>>>

>>>>>> Regards,

>>>

>>>>>> Lama Maksosa

>>>

>>>>>>

>>>

>>>>>>

>>>

>>>>>>

>>>

>>>>>>>> On Mon, Feb 8, 2021 at 1:28 PM Jeffrey Druckman <jeff@jjdlaw.com> wrote:

>>>

>>>>>>>

>>>

>>>>>>> Dear Ms. Maksosa:

>>>

>>>>>>>

>>>

>>>>>>> Andrew Moriarty, copied here, is handling this litigation on behalf of Amazon. Please direct all communication to him.

>>>

>>>>>>

>>>

>>>>>> Thank you.

>>>

>>>>>>

>>>

>>>>>> Jeffrey J. Druckman

>>>

>>>>>> Druckman & Blatt, P.C.

>>>

>>>>>> 424 S. Iowa Street

>>>

>>>>>> Portland, Oregon 97239

>>>

>>>>>> Telephone: 503.241.5033

>>>

>>>>>> Direct Dial: 503.241.5041

>>>

>>>>>> jeff@jjdlaw.com

>>>

>>>>>>

>>>

>>>>>>

>>>

>>>>>>> On Feb 7, 2021, at 11:15 AM, Lama Maksosa <lama.i.maksosa@gmail.com>  
wrote:

>>>

>>>>>>

>>>

>>>>>> Hello Mr. Druckman,

>>>

>>>>>>

>>>

>>>>>> I have not been able to afford an attorney to represent me, so I

>>>

>>>>>> went ahead with Pro Se filing.

>>>

>>>>>>

>>>

>>>>>> I will be also sending the summons via mail as well as per the

>>>

>>>>>> court guidelines outlined in the Pro Se manual.

>>>

>>>>>>

>>>

>>>>>> My complaint is below and was filed under case 1:21-cv-00025

>>>>>> with

>>>

>>>>>> the US District Court in Washington DC.

>>>

>>>>>>

>>>

>>>>>> Regards,

>>>

>>>>>> Lama maksosa

>>>

>>>>>>

>>>

>>>>>>

>>>

>>>>>>> On Mon, Oct 5, 2020 at 10:23 PM Lama Maksosa  
<lama.i.maksosa@gmail.com> wrote:



>>>

>>>>>>

>>>

>>>>>>

>>>

>>>>>> Hello Mr. Druckman...

>>>

>>>>>>

>>>

>>>>>> Please find the attached the letter I put together outlining my decision regarding the settlement.

>>>

>>>>>>

>>>

>>>>>> Kind Regards,

>>>

>>>>>>

>>>

>>>>>> Lama Maksosa

>>>

>>>>>>

>>>

>>>>>> [44044 Ferncliff Terrace, Ashburn, VA 20147](#)

>>>

>>>>>>

>>>

>>>>>> [Ph: 571-223-9759](#)

>>>

>>>>>>

>>>

>>>>>> [Linkedin | Twitter | Facebook](#)

>>>

>>>>>>

>>>

>>>>>> CC: Steve Pershing

>>>

>>>>>>

>>>

>>>>>> <COMPLAINT\_Lama Maksosa 2021.doc>

>>>

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>>>>>> \_\_\_\_\_

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>>>>>> NOTICE: This communication may contain privileged or other confidential information. If you have received it in error, please advise the sender by reply email and immediately delete the message and any attachments without copying or disclosing the contents. Thank you.

>>>

>>>>>

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>>>>> \_\_\_\_\_

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>>>

>>>>>> NOTICE: This communication may contain privileged or other confidential information. If you have received it in error, please advise the sender by reply email and immediately delete the message and any attachments without copying or disclosing the

contents. Thank you.

>>>

>>>

>>> \_\_\_\_\_

>>>

>>> NOTICE: This communication may contain privileged or other confidential information. If you have received it in error, please advise the sender by reply email and immediately delete the message and any attachments without copying or disclosing the contents. Thank you.

>>> <Waiver of Service of Summons.pdf>

>>

>> \_\_\_\_\_

>>

>> NOTICE: This communication may contain privileged or other confidential information. If you have received it in error, please advise the sender by reply email and immediately delete the message and any attachments without copying or disclosing the contents. Thank you.

>

> \_\_\_\_\_

>

> NOTICE: This communication may contain privileged or other confidential information. If you have received it in error, please advise the sender by reply email and immediately delete the message and any attachments without copying or disclosing the contents. Thank you.

> <Executed Waiver of Service of Summons.pdf>

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NOTICE: This communication may contain privileged or other confidential information. If you have received it in error, please advise the sender by reply email and immediately delete the message and any attachments without copying or disclosing the contents. Thank you.

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NOTICE: This communication may contain privileged or other confidential information. If you have received it in error, please advise the sender by reply email and immediately delete the message and any attachments without copying or disclosing the contents. Thank you.

3 attachments



**Notice of Apperance as Filed.pdf**

26K



**2021-03-24 Joint Motion to Stay.pdf**

25K



**2021-03-24 Consent Order Granting Joint Motion to Stay.pdf**

11K